

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

PAINTERS DISTRICT COUNCIL NO. 30,)	
)	
Plaintiff,)	08 C 1163
v.)	
)	
VINCO PAINTING INC.,)	Judge Conlon
)	Magistrate Judge Ashman
Defendant.)	
-----)	
VINCO PAINTING, INC.,)	
)	
Defendant/Counterplaintiff)	
vs.)	
)	
PAINTERS DISTRICT COUNCIL NO. 30.)	
)	
Plaintiff/Counterdefendant.)	

**DEFENDANT/COUNTER-PLAINTIFF'S MOTION TO EXTEND THE BRIEFING
SCHEDULE**

NOW COMES the Defendant/Counter-Plaintiff, VINCO PAINTING, INC. ("Vinco"), and for its Motion to Extend the Briefing Schedule on the Parties Cross-Motion for Summary Judgment for one additional week, states as follows:

1. On June 6, 2008, the parties filed their respective Motions for Summary Judgment. This Honorable Court ordered that responses and replies be filed on July 1, 2008 and July 9, 2008, respectively.
2. The undersigned counsel is requesting that the Court extend the deadlines to respond and reply one additional week since the undersigned counsel has recently relocated his office, which he had occupied for ten years, beginning on June 11, 2008 and it currently unpacking boxes at its new office. The move disrupted the undersigned's work schedule and the undersigned is currently without phone/internet due to problems with the telephone lines, which are expected to be repaired by the close of business on June 17.
3. The undersigned is also requesting a one-week extension since he is currently working

on an Appellate Brief due on June 30th in the Seventh Circuit Court of Appeals in the case captioned Chao v. Current Development Corp., et. al., No. 08-2254 and a brief which is also currently due on June 20, 2008 in the Appellate Court for the Second District of Illinois in the case captioned Board of Managers of the Gallery @ Gateway Centre Homeowners' Association v. Rippel, No. 2-07-1197 and responses to several Motions on June 20, 2008 in the case captioned Trustees of the Suburban Teamsters v. ATM Enterprises, No. 08 CV 1074.

WHEREFORE, Defendant/Counter-Plaintiff moves this Honorable Court to:

- A. Extend the deadline for the parties to respond to the pending Motions for Summary Judgment from July 1st to by July 8, 2008, and to
- B. Extend the deadline for the parties to reply to responses from July 9th to July 16, 2008.

Respectfully submitted,

VINCO PAINTING, INC.

By /s/ Joseph P. Berglund
One of Its Attorneys

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